

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
V.)	
)	No. 05-10039-NG
)	
Andres del Rosario Alayon, a.k.a)	
ANGEL FIGUEROA a.k.a. ARCENIO)	
POCHE CHACON,)	
)	
Defendant)	

MOTION FOR ORDER OF EXCLUDABLE DELAY THROUGH 2/27/06

The United States of America and the defendant, ANDRES DEL ROSARIO ALAYON a.k.a ANGEL FIGUEROA a.k.a. ARCENIO POCHE CHACON, hereby move for an order of excludable delay from July 12, 2005 through February 27, 2006. Delay is in the interests of justice because counsel for defendant intends to file a motion to suppress evidence that will not be ripe for decision for several weeks, and counsel for defendant has trial and other commitments which preclude effective preparation for an earlier trial date. Accordingly, the parties respectfully move that the Court order that such period be excluded.

Respectfully submitted,

Andres del Rosario Alayon, a.k.a
ANGEL FIGUEROA a.k.a. ARCENIO
POCHE CHACON,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Walter Underhill
WALTER UNDERHILL
Counsel for defendant

By: /s/ Nancy Rue
NANCY RUE
Assistant U.S. Attorney